

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL FINANCE CORPORATION,
not in its individual capacity but solely as the
Trustee for the IFC-Netherlands Carbon Facility
2121 Pennsylvania Avenue, N.W.,
Washington, DC 20433,

Plaintiff,

-against-

KORAT WASTE TO ENERGY CO. LTD.,
(a/k/a KHORAT WASTE TO ENERGY CO.)
571/11 Moo 3, Suranaree Industrial Zone,
Tambon NongBausala, Amphur Muang District,
Nakorn Ratchasima, 30000, Thailand,

Defendant.

07 Civ. 5451 (SHS) (ECF)

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

To the above-named Plaintiff:

PLEASE TAKE NOTICE THAT, pursuant to Rule 1.3(c) of the Local
Rules of the United States District Courts for the Southern and Eastern Districts of New
York, Elkan Abramowitz, a member in good standing of the bar of this Court, hereby
moves for an Order allowing the admission *pro hac vice* of:

J. Eileen Schwartz
Wallace King Domike & Reiskin, PLLC
1050 Thomas Jefferson St., NW
Washington, DC 20007
Phone: (202) 204-1000
Fax: (202) 204-1001

Ms. Schwartz is a member in good standing of the bar of the State of
Maryland.

There are no pending disciplinary proceedings against Ms. Schwartz.

Dated: August 20, 2007
New York, New York

MORVILLO, ABRAMOWITZ, GRAND,
IASON, ANELLO & BOHRER, P.C.

By: 

Elkan Abramowitz (EA-3987)

Thomas M. Keane (TK-6320)

565 Fifth Avenue

New York, New York 10017

Phone: (212) 856-9600

Fax: (212) 856-9494

Attorneys for Defendant

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**AFFIDAVIT OF
THOMAS M. KEANE
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

THOMAS M. KEANE, being duly sworn, deposes and says:

1. I am an attorney with the firm of Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer, P.C., counsel for defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement in support of defendant's motion to admit J. Eileen Schwartz as counsel *pro hac vice* to represent defendant in this action.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Ms. Schwartz is associated with the firm of Wallace King Domike & Reiskin, PLLC, in Washington, DC. She is a member in good standing of the bar of the State of Maryland. A copy of a Certificate of Good Standing from the State of Maryland, issued within 30 days of the date hereof, is attached hereto as exhibit A.

4. I am informed and believe that Ms. Schwartz is a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

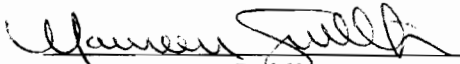
5. Accordingly, I am pleased to move the admission of J. Eileen Schwartz, *pro hac vice*.

6. I respectfully submit a proposed Order granting the admission of J. Eileen Schwartz, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit J. Eileen Schwartz, *pro hac vice*, to represent defendant in the above-captioned matter, be granted.


THOMAS M. KEANE

Sworn to before me this
20th day of August, 2007


Notary Public

MAUREEN SMITH
Notary Public, State of New York
No. 01SM5077496
Qualified in Kings County
Commission Expires May 12, 20 11

**Court of Appeals
of Maryland**
Annapolis, Md.



CERTIFICATION

STATE OF MARYLAND, ss:

*I, Alexander L. Cummings, Clerk of the Court of Appeals
of Maryland, do hereby certify that on the _____th day
of _____, 2006,*

Jennifer Eileen Schwartz

*having first taken and subscribed the oath prescribed by the Constitution
and Laws of this State, was admitted as an attorney of said Court, is now
in good standing, and as such is entitled to practice law in any of the
Courts of said State, subject to the Rules of Court.*

**In Testimony Whereof, I have hereunto set my
hand as Clerk, and affixed the Seal of the Court of
Appeals of Maryland, this _____^{25th} day of
_____^{July}, 2007.**

Alexander L. Cummings

Clerk of the Court of Appeals of Maryland

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Tambon NongBausala, Amphur Muang District,
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Defendant.

07 Civ. 5451 (SHS) (ECF)

**ORDER FOR ADMISSION
OF COUNSEL PRO HAC VICE**

Upon the motion of Thomas M. Keane, attorney for defendant, and said
sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that:

J. Eileen Schwartz
Wallace King Domike & Reiskin, PLLC
1050 Thomas Jefferson St., NW
Washington, DC 20007
Phone: (202) 204-1000
Fax: (202) 204-1001
eschwartz@wallaceking.com

is admitted to practice *pro hac vice* as counsel for defendant Korat Waste to Energy Co.
Ltd. in the above-captioned case in the United States District Court for the Southern
District of New York.

All attorneys appearing before this Court are subject to the Local Rules of
this Court, including the Rules governing discipline of attorneys.

Counsel shall apply immediately for a password for the Court's Electronic Case Filing system and shall forward the *pro hac vice* fee to the Clerk of the Court.

IT IS SO ORDERED this ____ day of August, 2007

Sidney H. Stein, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that, on August 20, 2007, I caused a copy of defendant's foregoing Notice of Motion to Admit Counsel Pro Hac Vice, with the Supporting Affidavit of Elkan Thomas M. Keane and the exhibits thereto, to be sent via e-mail and U.S. Mail first class, postage-prepaid to plaintiff's counsel of record:

Francis A. Vasquez, Jr., Esq.
WHITE & CASE, LLP
701 Thirteenth Street, N.W.
Washington, DC 20005
fvasquez@whitecase.com

Dated: New York, New York
August 20, 2007

A handwritten signature in black ink, appearing to read 'T. M. Keane', written over a horizontal line.

THOMAS M. KEANE